

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| IN RE: NEIGHBORS LEGACY HOLDINGS, INC., et al. <i>Debtors</i> | § § § § | CASE NO. 18-33836-H1-11 (Chapter 11) JOINTLY ADMINISTERED |
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MARK SHAPIRO, TRUSTEE OF THE
UNSECURED CREDITOR TRUST OF
NEIGHBORS LEGACY HOLDINGS,
INC. AND ITS DEBTOR AFFILIATES
Plaintiff

v.

TOM VO, et al.
Defendants

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ADV. P. NO. 20-03016

AGREED STIPULATION EXTENDING DATES IN AGREED SCHEDULING ORDER

TO THE HONORABLE MARVIN ISGUR, U.S. BANKRUPTCY JUDGE:

COMES NOW, PLAINTIFF MARK SHAPIRO, TRUSTEE OF THE UNSECURED CREDITOR TRUST OF NEIGHBORS LEGACY HOLDINGS, INC. AND ITS DEBTOR AFFILIATES and files this Agreed Stipulation Extending Dates in Agreed Scheduling Order, and respectfully show the Court as follows:

On May 17, 2021, this Court entered the Agreed Scheduling Order in this case (Dkt. 129). Since then, more settlements have occurred between Plaintiff and various Defendants, and the Parties continue to focus their efforts on reaching settlement agreements. For these reasons, Plaintiff has reached an agreement with counsel for Neighbors of the Permian Basin, LLC and Emergence Holdings, LLC to extend the deadlines contained within the first four items of the Agreed Scheduling Order.

The deadline for Plaintiff to designate expert witnesses will now be August 25, 2021. The Plaintiff/Trustee will present its expert(s) for deposition on or before September 5, 2021. Defendants Neighbors of the Permian Basin, LLC and Emergence Holdings, LLC will have until October 27, 2021 to designate expert witnesses. Defendants Neighbors of the Permian Basin, LLC and Emergence Holdings, LLC will present their expert(s) for deposition on or before November 8, 2021. The other dates in the Agreed Scheduling Order shall remain the same.

Respectfully Submitted,

WALSTON BOWLIN, LLP

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EMERGENCE HOLDINGS, LLC**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed and served electronically, via the ECF system, on July 23, 2021.

/s/ Clifford H. Walston

Clifford H. Walston